



"James Peale"
<jpeale@maulfoster.com>

10/01/2008 08:42 AM


To: Kristine Koch/R10/USEPA/US@EPA

cc

bcc

Subject: FW: Siltronic, EIB Work Plan and Addendum Comments

History:

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JAMES G.D. PEALE RG, LHG | MAUL FOSTER ALONGI

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From: James Peale

Sent: Tuesday, September 30, 2008 5:13 PM

To: 'BAYUK Dana'

Cc: 'Gladstone, Alan'; McCue, Tom; Chris Reive; Tom Gainer; Henning Larsen; Erik Bakkom

Subject: RE: Siltronic, EIB Work Plan and Addendum Comments

Dana – we are available to meet tomorrow at 3:30.

Attached please find draft figures providing additional detail for the Phase I, Phase II, and Phase III approaches. As these are draft, there are some clarifications:

- 1) Regarding the Phase I figure, please note that we have modified the pilot study approach to include four rows of injection points (as opposed to three rows) in order to enhance the performance and minimize the potential for downgradient distribution of daughter products.
- 2) Regarding the Phase II figure, the legend omits an entry identifying the proposed PMWs; however they are correctly identified in the legend for Phase I.
- 3) Regarding the Phase III figure, the air knifed locations on the south side of the access road represent potential additional delineation points. These are located in areas where additional injection into the MGP DNAPL containing TCE could occur.

Regarding sequencing/scheduling, we anticipate that these phases would occur sequentially. We look forward to discussing these figures and identifying a path forward with you tomorrow.

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From: BAYUK Dana [<mailto:BAYUK.Dana@deq.state.or.us>]

Sent: Tuesday, September 30, 2008 1:23 PM

To: McCue, Tom

Cc: Gladstone, Alan; James Peale; Erik Bakkom; Bob Wyatt; Hart, Sandi; Kirkpatrick, Margaret; Patty Dost (Schwabe); koch.kristine@epa.gov; ANDERSON Jim M; GAINER Tom; LARSEN Henning; MCCLINCY Matt

Subject: Siltronic, EIB Work Plan and Addendum Comments

Good afternoon Tom

DEQ reviewed the "Enhanced Bioremediation Source Control Work Plan," (EIB Work Plan) and "Addendum to the Enhanced Bioremediation Source Control Work Plan – Phase I Injection Plan," (Phase I Injection Plan). Our comments letter is attached, and a signed hard copy will be sent to you via regular mail this week.

<<Lfnl-EIBWorkPlan.doc>>

Based on our review, DEQ did not approve the EIB Work Plan and Phase I Injection Plan. We determined the EIB Work Plan should be revised to include the injection plans for all phases of enhanced in-situ bioremediation (EIB) applications being considered by Siltronic in the area of the former solvent underground storage tank system (Former UST System). DEQ also clarified our position on certain EIB remedial action objectives, and our expectations for monitoring EIB performance.

DEQ is available to meet tomorrow October 1st between 8am-12pm and from 330-5pm, and on Thursday October 2nd from 8-10am to discuss the comments letter. Please contact me to let me know if any of these dates/times work for the Siltronic team.

DEQ appreciates and acknowledges the work Siltronic is conducting to delineate and address impacts associated with the Former UST System. Please feel free to contact me with questions regarding this e-mail and/or the attachment.

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Please visit our website at <http://www.oregon.gov/DEQ/>



Fig_Proposed_Source_Area_Injection_Phase1.pdf



Fig_Proposed_Source_Area_Injection_Phase2.pdf



Fig_Air Knife for Phase III.pdf